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July 1, 1998

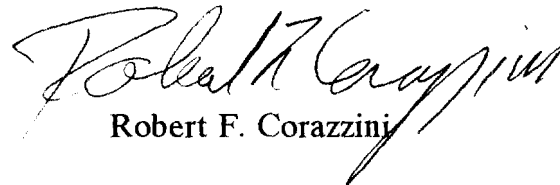
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

**Re: Amendment of Parts 21 and 74 to Enable Multipoint
Distribution Service and Instructional Television Fixed
Service Licensees to Engage in Fixed Two-Way Transmissions -
MM Docket No. 97-217 and RM-9060: EX PARTE
COMMUNICATION**

Dear Ms. Salas:

Transmitted herewith on behalf of Valley Lutheran High School, is an original and fifteen (15) copies of its additional comments in the above-referenced rule making proceeding invited by the Commission pursuant to its June 12, 1998 public notice (DA 98-1119). Eleven copies are provided herewith for distribution to each Commissioner and staff member identified on the comments as receiving a copy of this filing. Should there be any questions concerning this matter, please communicate directly with the undersigned.

Very truly yours,


Robert F. Corazzini

Enclosure

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June 29, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications commission
1919 M Street, N.W.
Washington, D.C. 20554

**Re: Amendment of Parts 21 and 74 Enable Multipoint
Distribution Service and Instructional Television Fixed
Service Licensees to Engage in Fixed Two-Way Transmissions-
MM Docket No. 97-217 and RM-9060: EX PARTE
COMMUNICATION**

Dear Ms. Salas:

This letter is submitted by Valley Lutheran High School ("Valley Lutheran") to the Commission in accordance with its June 12, 1998 Public Notice (DA 98-1119) in the above-referenced proceeding. As a recently authorized licensee with limited financial resources, we believe that it is important that our ITFS system be operated with state-of-the-art technology, including two-way transmissions. Valley Lutheran, as the licensee of two ITFS (G) channels with less than two years experience, does not wish, and financially cannot afford to operate with a technology that is outmoded and well behind the latest developments in the field.

While many factors are involved, we are increasingly aware that the success of our distance learning education will depend in large part upon the success of the wireless cable system with which we have contracted. Because wireless cable will be competing against a variety of other providers of two-way services that are not subject to regulatory delay, it is essential that the Commission's new rules permit the rapid inauguration of two-way services, without application processing delays or burdensome testing requirements.

Valley Lutheran is enthusiastic about the educational potential of two-way technology when fully available for use by educators. That potential will not be realized unless we are eligible to use our own channels for return path applications. We are aware of the proposals by the ITFS and MDS entities ("Petitioners") which launched this proceeding. We believe that the Petitioners' proposed interference protection rules and policies provide adequate protection of the ITFS interests and urge adoption of the proposals. We also agree with petitioners that delays in the processing of applications must be avoided and the commencement of two-way services must itself be without delay.

Valley Lutheran is also aware that the National ITFS Association, Inc., and the Wireless Communications Association International, Inc., entered into a Joint Statement of Position in January of 1998 and has filed that document with the FCC. Valley Lutheran wishes to join in support of that Position which emphasizes flexibility,

elimination of administrative delay and making available the capacity to utilize two-way transmissions to ITFS licensees on their own ITFS channels.

We appreciate the opportunity to express our support for the two-way licensing process proposed by the Petitioners. We sincerely hope that this proceeding will move forward to a culmination in an expedited fashion.

Respectfully submitted,

Valley Lutheran High School

By:


Rev. James Wiese

cc: Hon. William E. Kennard
Hon. Susan Ness
Hon. Harold Furchtgott-Roth
Hon. Michael K. Powell
Hon. Gloria Tristani
Mr. Roy Stewart
Mr. Keith Larson
Ms. Barbara Kreisman
Mr. Charles Dziedzic
Mr. Michael Jacobs
Mr. David Roberts